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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MERRILL LYNCH BUSINESS
FINANCIAL SERVICES, INC.,

Plaintiff,

vs.

ARTHUR KUPPERMAN, E.
ROSS BROWNE, PAULETTER
KRELMAN and PGB
INTERNATIONAL, LLC, and J.P.
MORGAN CHASE BANK,
NATIONAL ASSOCIATION,

Defendants.

Case No. 06-4802 (DMC)

**SUPPLEMENTAL CERTIFICATION
OF MARK A. RONEY, ESQ.**

MARK A. RONEY hereby certifies and says as follows:

1. I am attorney-at-law of the State of New Jersey, and am associated with the law firm of Saiber Schlesinger Satz & Goldstein, LLC (“SSS&G”), counsel for the defendant E. Ross Browne (“Browne”) in the above captioned matter. I have personal knowledge of the facts set forth herein.

2. Prior to submitting my Certification in Further Support of Mr. Browne's Opposition to JPMorgan Chase, N.A.'s ("Chase") Motion for Partial Summary Judgment dated March 1, 2007 (the "March 1st Certification"), I reviewed SSS&G's files with respect to this matter to determine which personal financial statements from Mr. Browne had been produced by Chase, if any. During the course of that review, I discovered only the financial statement attached as Exhibit A to my March 1st Certification, and so certified in the March 1st Certification at paragraph four. My review did not reveal the financial statements referenced in the Supplemental Declaration of Paul H. Schafhauser dated March 6, 2007 as Exhibits A and B.

3. After reviewing Mr. Schafhauser's Supplemental Declaration, I conducted another review of SSS&G's files and discovered that the documents referenced as Exhibits A and B were, in fact, contained in SSS&G's files in a folder containing general correspondence.

4. I do not recall reviewing the general correspondence folder in my initial review of the file and that appears to be the reason why I did not discover the documents.

5. The failure to reference these documents in the March 1st Certification, and our accompanying letter brief, was completely inadvertent and unintentional. Accordingly, I hereby withdraw the statement made in paragraph

four of the March 1st Certification that “Chase has not produced to SSS&G or Browne any other financial statements relating to Mr. Browne.” SSS&G has authorized me to withdraw any statements and arguments in our supporting letter brief to the effect that there was only one financial statement from Mr. Browne produced by Chase.

I hereby certify the foregoing statements made by me are true. I am aware that if the foregoing statements made by me are determined to be willfully false, I may be subject to punishment.

s/ Mark A. Roney
MARK A. RONEY

Dated: March 7, 2007